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April 3, 2006

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, Second Floor
Boston, MA 02110

Re: D.T.E. 05-82 – Petition of Dig Safe Systems, Inc.

Dear Ms. Cottrell:

Enclosed for filing in the above-captioned matter, please find Verizon's Comments.

Thank you for your assistance in this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Barbara Anne Sousa".

Barbara Anne Sousa

cc: Tina W. Chin, Hearing Officer
Paula Foley, Assistant General Counsel
Michael Isenberg, Director – Telecommunications Division
April Mulqueen, Assistant Director – Telecommunications Division
Stella Finn, Analyst
Service List

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 05-82

A one-call notification system is “a communications system established by operators of underground facilities and/or state governments in order to provide a means for excavators and the general public to notify facility operators in advance of their intent to engage in excavation activities.” *FCC 811 Order*, 20 F.C.C.R. at 5539, ¶2.

VERIZON MA'S RESPONSES TO THE DEPARTMENT'S QUESTIONS

Question 1: What Needs to Be Done to Implement 811 by Dig Safe, telecommunications carriers, and users of the 811 service?

Answer: "811 Service" is a telecommunications service that utilizes an abbreviated dialing code enabling callers to reach a one-call center by dialing "811" rather than a seven or ten-digit telephone number. The 811 service is purchased from the local exchange carrier or "service provider" ("SP") by the 811 one-call center responsible for answering 811 calls, under either a contract or tariff arrangement. The "end user" is the caller who contacts the 811 one-call center for information regarding underground facilities and excavation activities.

The 811 one-call center (Dig Safe in Massachusetts) would initiate the process of establishing 811 service by contacting the SPs in the NPA-NXX areas where the 811 service will be deployed ("Service Deployment Area" or "SDA"). Before 811 service can be provided, each SP must program its network to translate the calling NPA-NXX originating the three-digit "811" dialing code into the appropriate seven or ten-digit telephone number to properly route the call to the designated one-call center responsible for calls originating from that calling NPA-NXX. The 811 service ordinarily employs the Advanced Intelligent Network ("AIN"), where available, for this purpose.

In implementing 811 service, Verizon MA requires that the various parties assume certain responsibilities and coordinate activities throughout the process. The SPs are responsible for the following: (1) prepare or purchase the software necessary to offer 811 service; (2) develop the commercial documents and/or tariffs to compensate it for the service it provides; (3) participate in one-call center implementation planning meetings; (4) provide one-call centers with appropriate documents and other information for planning and ordering of 811 Service; and

(5) establish and maintain switching translations used by each switch to route 811 traffic to the appropriate call center.

The responsibilities of the one-call center (Dig Safe) are to: (1) obtain approval from the state regulatory agency to be the designated recipient of 811 calls from the SPs for specific NPA-NXXs; (2) organize a planning conference with all local exchange carriers (“LECs”), competitive local exchange carriers (“CLECs”), customer-owned coin-operated telephone providers (“COCOTs”) and wireless service providers providing service within the one-call center’s SDA; and (3) provide SPs with a toll-free number for use by each originating switch to route 811 calls to the appropriate one-call center.

In addition, the one-call center and the SP must agree upon the dates when the network will be ready for testing, *i.e.*, “test-ready” and “in-service ready” dates, to complete the required service provisioning steps. These dates may be mutually agreed upon by the parties only after the following activities are completed: (1) a contract for the 811 service is signed by the one-call center; (2) the information needed to complete the service order and perform billing is entered into the SP’s service order system; (3) all other necessary 811 Data Gathering Form (“DGF”) documentation² is submitted by the one-call center to the SP; and (4) customer facilities for delivering the traffic are confirmed to be operational. It is estimated that approximately three months are required for provisioning of 811 service, assuming that all documentation, agreements, facilities and billing information are properly completed and forwarded when requested by the SP.

² The DGF documentation required by Verizon MA includes, *inter alia*, one-call center address, customer contact point, phone numbers associated with service billing, and operational contact information.

Finally, end-user notification of 811 dialing availability is best left to the one-call center, which already has well-established advertising, publicity and other distribution channels for conveying its message to the full range of its utility member, business and residential audiences.

Question 2: What are the technical, operational and compliance issues relating to 811 implementation?

The *FCC 811 Order* requires that 811 calls must be local or toll-free if the call would be a non-local call. *FCC 811 Order*, 20 F.C.C.R. at 5539, ¶¶2, 6, 26. To comply with that requirement, the one-call center may choose to use a toll-free telephone number for all calls, or identify two unique ten-digit telephone numbers – a local and a toll telephone number – depending on whether some calls reaching the one-call center will be toll calls. The local telephone number would be the ten-digit number that does not have any distance sensitive charges associated from the point of origination of the 811 call to the point where the call is terminated at the 811 one-call center. The toll telephone number would be toll-free (*e.g.*, 800, 866, 877 prefix) number.

Prior to routing an 811 call, AIN processing will determine whether the 811 one-call center termination is local or toll. If no distance-sensitive charges would apply, the 811 call will be routed to the one-call center using the local telephone number. However, if routing the 811 call would ordinarily trigger distance-sensitive charges, then the 811 call will be routed via a toll-free telephone number furnished by the one-call center. In no instance should the one-call center be authorized to require call routing to a toll destination without the use of a toll-free telephone number.

In accordance with FCC requirements, the one-call center is responsible for notifying the SPs of the local and/or toll-free number the one-call center uses to ensure that 811 callers do not incur toll charges. *FCC 811 Order*, 20 F.C.C.R. at 5539, ¶ 26.

See also Verizon MA's Answer to DTE Question 1 above for a discussion of other 811 service implementation issues.

Question 3: What is the actual schedule to meet the FCC's April 2007 deadline for 811 implementation?

The actual schedule has not yet been determined in Massachusetts by Dig Safe and the SPs. Although coordination between the one-call center and numerous SPs is critical, the timely implementation of 811 dialing throughout the Commonwealth should be relatively straightforward and uncomplicated.

Verizon MA expects to have its operational system and network in place for implementation of 811 service during the third quarter of 2006. Once a contract is executed with Dig Safe and the necessary network and billing documentation is exchanged, the parties will agree upon testing dates, as described in detail in Verizon MA's Answer to Question 1 above. Approximately 12 weeks is then required to complete the implementation of 811 service.

Question 4: Who has cost responsibility for implementing and operating 811 service?

Verizon MA believes that the SPs should be compensated for providing 811 service to Dig Safe, just as they are compensated for providing other services to business and institutional customers. Verizon MA's intrastate tariff for N11 services requires that the Company recover its 811 service provisioning costs on an individual contract basis ("ICB") from Dig Safe.³

As for the costs that Dig Safe will incur to obtain 811 service, they are no different than other operating expenses of Dig Safe and thus must be "apportioned equitably" among the underground utility providers, including Verizon MA, which currently fund Dig Safe's operations pursuant to Mass. General Laws c. 164, § 76D.

³ DTE MA Tariff No. 10, Part A, Section 12.21.4 (Application of Rates and Charges) states that "N11 dialing service is a custom designed application and is available only under an individual contract basis."

Question 5: What must be done to halt any current uses of 811 service in Massachusetts?

Verizon MA is not currently using the 811 code and will only deploy the 811 code to be used in connection with the state's one-call notification system. Verizon Business (formerly MCI) and Verizon Wireless have already deployed the 811 code in their networks in Massachusetts.

Question 6: What are other states doing or have done – with respect to this matter?

Verizon is aware of approximately 14 states – including Massachusetts – that are examining the implementation of 811 service. They are: California, Florida, Idaho, Indiana, Maine, Massachusetts, New Hampshire, New York, North Carolina, Ohio, Pennsylvania, Rhode Island, Virginia and West Virginia. To date, none of those states has issued a final decision on implementation of 811 service. Regarding the New England states, Rhode Island recently conducted a conference call for all interested parties and requested quarterly reports for implementation of 811 service. The New Hampshire Commission has conducted one technical conference and has scheduled another.

Question 7: Are evidentiary hearings necessary in this docket? If so, please provide a proposed schedule.

Verizon MA does not believe that evidentiary hearings are required and, therefore, has proposed no modifications to the procedural schedule at this time.

Question 8: Please identify and address any other relevant issues relating to 811 service which the commenters feel are necessary.

In the spirit of the *FCC 811 Order* that initiated the designation of the national abbreviated 811 dialing code, all underground utility providers should be required to participate and make use of the designated one-call center in each of their service territories. *FCC 811 Order*, 20 F.C.C.R. at 5539, ¶2.

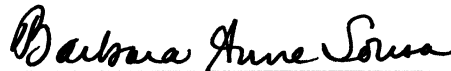
CONCLUSION

The implementation of 811 service will require the cooperation of all parties involved. Each of the parties must assume responsibility for its part of the implementation. Likewise, 811 SPs must be compensated for their service under applicable tariffs and/or contractual arrangements.

Respectfully submitted,

VERIZON MASSACHUSETTS

Its Attorneys,

A handwritten signature in black ink, reading "Barbara Anne Sousa". The signature is written in a cursive style with a horizontal line underneath.

Alexander Moore
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Dated: April 3, 2006